

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MIRIAM CRUZ, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

The Pace Gallery, LLC,

Defendant.

Case No. 1:23-cv-101

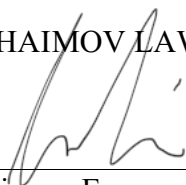
**STIPULATION OF DISMISSAL
WITHOUT PREJUDICE PURSUANT
TO F.R.C.P. 41(a)(1)(A)(ii)**

STIPULATION OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)

IT IS HEREBY STIPULATED AND AGREED by and between the parties and/or their respective counsel(s) that pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) all claims in the above-captioned action against Defendant The Pace Gallery, LLC, are dismissed without prejudice with each party bearing their own costs, expenses, and attorney's fees. Plaintiff and Defendant have agreed to terms and conditions representing a negotiated settlement of this action and have set forth those terms in a Confidential Settlement Agreement.

Dated: 05/30/23

MARS KHAIMOV LAW, PLLC



Mars Khaimov, Esq.
108-26 64th avenue, Second Floor
Forest Hills, New York 11375
Tel.: (929) 324-0717
Fax: (929) 333-7774
mars@khaimovlaw.com

Attorneys for Plaintiff

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Maaren A. Shah

Maaren A. Shah
Luke Nikas
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel.: (212) 849-7000
Fax: (212) 849-7100
alexspiro@quinnemanuel.com
maarensah@quinnemanuel.com

Attorneys for Defendant